NEVADA DIVISION OF ENVIRONMENTAL PROTECTION

F A C T S H E E T
(pursuant to NAC 445A.874)

Permittee Name: **Travelways**
Permit Project: **Gagne Coach Maintenance**
Permit Number: **UNEV2001202**

A. Description of Injection

Location: The single network of five (5) injection wells is located at 1305 North Main Street, Las Vegas, Nevada 89025 in the NE ¼ of Section 27 within T20S, R61E, MDB&M, in Clark County.

Characteristics: The injectate consists of a 3 % hydrogen peroxide solution prepared with dechlorinated water. It will be injected at a maximum of 3,000 gallons per quarter into a network of five (5) injection wells.

B. Synopsis

Gagne Coach operates as a motor coach repair facility. On February 25, 2000, a release of diesel fuel from a pressurized product piping line was discovered at the property. Over four (4) feet of free product was discovered to be present in MW-2 (See Attachment A for Site Map). To date, approximately 40 gallons of free product has been recovered. At this time, there is no measurable amount of free product observed in any of the monitoring wells. Even though this is a diesel release, there are small concentrations of volatile constituents (BTEX and MTBE). Based upon the nature of the release, a semi-volatile analysis will be incorporated as a monitoring requirement.

A 3 % hydrogen peroxide solution will be utilized at this site. The solution will be generated utilizing dechlorinated water. The solution will subsequently be injected directly into the authorized injection wells. The wells authorized for injection include MW-1, MW-4, MW-7, IP-1 and IP-2. IP-1 and IP-2 are subsurface horizontal wells which are classified as injection wells based upon their performance as a subsurface fluid distribution system.

The hydrogen peroxide is expected to provide a source of oxygen for the indigenous microbes which should enhance the in-situ bioremediation process for the contaminants present at this site. Monitoring will be implemented to ensure the contamination does not migrate as a result of injection.

C. Receiving Water Characteristics:

Groundwater sampling at this site has demonstrated the presence of dissolved petroleum hydrocarbons, mostly heavy-ended diesel fraction. The contaminant concentrations are in excess of the State and Federal action levels.

The geology encountered during well construction consists of predominantly silty sand with some course sand and traces of clay and gravel. Groundwater is present at approximately 17 feet below ground surface and the average local gradient is estimated to be approximately 0.037 ft/ft in the north northeasterly direction.

The groundwater quality at this site has demonstrated the following concentrations, as determined by groundwater samples analyzed in September of 2000:

Constituent	Existing Groundwater Concentration	Limit
Benzene	41 ppb	5 ppb (State and Federal Limit)
Toluene	58 ppb	100 ppb (State Limit)
Ethylbenzene	44 ppb	100 ppb (State Limit)
Xylenes (total)	112 ppb	200 ppb (State Limit)
MTBE	180 ppb	200 ppb (Site Specific Target Level)
TPH (extractables)	1,100 ppm	1 ppm (State Limit)
Iron	5.9 ppm	0.6 ppm (secondary standard)
TDS	997 ppm	1000 ppm (secondary standard)

D. Procedures for Public Comment

Notice of the Division's intent to issue a permit authorizing the facility to inject into the groundwater of the State of Nevada will be sent to the Las Vegas Review Journal for publication. The notice will be mailed to interested persons on our mailing list (See Attachment B).

Anyone wishing to comment on the proposed permit can do so in writing for a period of 30 days following the publication date of the said public notice. The comment period can be extended at the discretion of the Administrator. All written comments received during the comment period will be retained and considered in the final determination.

A public hearing on the proposed determination can be requested by the applicant, any affected state, any affected interstate agency, the regional administrator of EPA Region IX or any interested agency, person or group of persons.

Any public hearing determined by the Administrator to be held must be conducted in the geographical area of the proposed discharge or any other area the Administrator determines to be appropriate. All public hearings will be conducted in accordance with NAC 445A.238.

The final determination of the Administrator may be appealed to the State Environmental Commission pursuant to NRS 445A.605.

E. Proposed Determination

The Division has made the tentative determination to issue the proposed permit for a five year period.

F. Proposed Limitations and Special Conditions

PARAMETER	FREQUENCY	LOCATION	LIMITATIONS
Benzene, Toluene, Ethylbenzene, total Xylenes (BTEX), and methyl tertiary butyl ether (MTBE)	Quarterly	MW-1, MW-2, MW-4, MW-5, MW-6 MW-7, MW-8, MW-9 and MW-10	Monitor and Report
Semi Volatile Analysis	Quarter (Samples shall be taken no sooner than 10 days following injection event)	MW-1	Monitor and Report
Dissolved Oxygen and pH	Quarterly	MW-1, MW-2, MW-4, MW-5, MW-6 MW-7, MW-8, MW-9 and MW-10	Monitor and Report

PARAMETER	FREQUENCY	LOCATION	LIMITATION
Iron II	Quarterly	MW-1, MW-2, MW-4, MW-5, MW-6 MW-7, MW-8, MW-9 and MW-10	Monitor and Report
Hydrogen peroxide: Concentration Volume per Well Date Injected	Each Injection Event	All Affected Injection Wells	3 % Solution with a maximum of 3,000 gallons per quarter
Groundwater Elevation and Depth to Groundwater	Quarterly	All Site-Related Monitoring Wells	Monitor and Report

G. **Rationale for Permit Requirements**

The permit conditions will help to ensure that the injectate does not adversely affect the existing water quality or hydrologic regime.

Prepared by: Valerie G. King
Date: April, 2000